

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	Hon. Anne E. Thompson
v.	:	
	:	Criminal No. 19-029 (AET)
GEORGE GILMORE	:	
	:	

**NOTICE OF MOTION TO EXCLUDE TESTIMONY BY DEFENDANT’S PROPOSED
EXPERT WITNESS**

TO: Kevin H. Marino, Esq.
Marino, Tortorella & Boyle, P.C.
437 Southern Boulevard
Chatham, New Jersey 07928-1488
Counsel for Defendant George Gilmore

PLEASE TAKE NOTICE that on a date to be determined by the Court, as soon as counsel may be heard, the United States, by and through its attorney, Rachael A. Honig, Attorney for the United States acting under authority conferred by 28 U.S.C. § 515, Matthew J. Skahill, Deputy U.S. Attorney, Jihee G. Suh, Assistant United States Attorney, and Thomas F. Koelbl, Trial Attorney, U.S. Department of Justice-Tax Division, will move before the Honorable Anne E. Thompson, Senior United States District Judge, to exclude testimony by Defendant’s proposed expert witness.

The United States will rely upon oral argument and its memorandum of law, filed herewith.

Respectfully submitted,

RACHAEL A. HONIG
Attorney for the United States
Acting Under Authority Conferred
by 28 U.S.C. § 515

By: /s/ Matthew J. Skahill
/s/ Jihee G. Suh
MATTHEW J. SKAHILL
Deputy U.S. Attorney
JIHEE G. SUH
Assistant U.S. Attorney

/s/ Thomas F. Koelbl
THOMAS F. KOELBL
Trial Attorney
U.S. Department of Justice-Tax Division

Dated: March 4, 2019